

EXHIBIT E

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

PATRICIA ENGLISH AND
RICHARD ENGLISH, HER HUSBAND
122 WEST MORTON STREET
OLD FORGE, PA 18518

Plaintiffs

v.

CROWN EQUIPMENT CORPORATION
44 SOUTH WASHINGTON STREET
NEW BREMEN, OHIO 45869

Defendant

CIVIL ACTION NO.
3: 13-CV-00978-MEM

(Judge Malachy E. Mannion)

JOINT PROPOSED VERDICT SLIP

1. Do you find that the Crown Stock Picker was defectively designed?

_____ Yes _____ No

If your answer to Question No. 1 is "Yes", proceed to Question No. 2.

If your answer to Question No. 1 is "No" proceed to Question No. 3.

2. Was the defective design of the Crown Stock Picker a factual cause in bringing about harm to the Plaintiff, Patricia English?

_____ Yes _____ No.

Please proceed to Question No. 3.

3. Did Crown Equipment Corporation negligently design the Stock Picker?

_____ Yes _____ No.

If your answer to Question No. 3 is "Yes", proceed to Question No. 4.

If your answer to Question No. 3 is "No" but you answered "Yes" to Question Nos. 1 and 2, you should proceed to Question No. 8.

If your answer to Question Nos. 1 or 2 and to Question No. 3 is "No", your work is done and you should return to the Courtroom.

4. Was the negligence of Crown Equipment Corporation a factual cause in bringing about the Plaintiff's harm?

_____ Yes _____ No.

If your answer to Question No. 4 is "Yes", proceed to Question No. 5.

If your answer to Question No. 4 is "No", proceed to Question No. 8.

5. Was the Plaintiff, Patricia English, contributorily negligent?

_____ Yes _____ No.

If your answer to Question No. 5 is "Yes", proceed to Question No. 6.

If your answer to Question No. 5 is "No", proceed to Question No. 8.

6. Was the contributory negligence of Plaintiff, Patricia English, a factual cause in bringing about her harm?

_____ Yes _____ No.

If your answer to Question No. 6 is "Yes", proceed to Question No. 7.

If your answer to Question No. 6 is "No" proceed to Question No. 8.

7. What percentage of negligence do you assign to the:

Defendant, Crown Equipment Corporation _____ %

Plaintiff, Patricia English _____ %

Total _____ 100 %

Proceed to Question No. 8 unless you have answered "No" to Question No. 1 and Question No. 2 and you have assigned more than 50% negligence to the Plaintiff Patricia English.

8. Please state the amount of damages to compensate the Plaintiff for the following:

- a. Past, present and future pain and suffering, embarrassment and humiliation, and the loss of ability to enjoy life's pleasures;

\$ _____

- b. Past, present and future lost wages and loss of earning capacity;

\$ _____

- c. Past, present and future medical expenses; and

\$ _____

- d. Loss of consortium for Richard English.

\$ _____

Total \$ _____

DATE

FOREPERSON